

UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND

In Re: DAVID W. WAGNER

18-10071
Chapter 7

STACY B. FERRARA, TRUSTEE

VS.

A.P. 19-AP-01010

DAVID W. WAGNER

JOINT MOTION TO EXTEND DEADLINES

Now comes the Debtor David Wagner (“Debtor/Defendant”) and the Chapter 7 Trustee Stacy B. Ferrara (“Trustee”) and request that the Court extend the deadlines for filing Discovery Plan and Scheduling Order in the above Adversary Proceeding.

As grounds therefore, the Debtor and Trustee state as follows:

1. The Defendant filed a Chapter 7 case *pro se* on January 17, 2018.
2. The Plaintiff filed the within complaint on March 29, 2019 objecting to the Debtor’s discharge under 11 U.S.C. § 727.
3. There are several adversary proceedings presently pending before the Court, including this proceeding.
4. The Debtor has recently become involved in Federal Court proceedings in Massachusetts and in the South District of New York.
5. On April 23, 2019 the Court entered pre-trial scheduling orders in this Adversary Proceeding for filing the Discovery Plan on July 15, 2019 and the Scheduling Order on July 22, 2019.
6. On May 8, 2019 the Court updated the aforementioned deadlines to July 1, 2019 for the filing of the Discovery Plan and to July 8, 2019 for the filing of the Scheduling Order.
7. Plaintiff and Defendant request that this Court extend the time for the filing of both the Discovery Plan and Scheduling Order for a period of thirty (30) days, to August 1, 2019 for filing the Discovery Plan and to August 8, 2019 for the filing of the Scheduling Order.

WHEREFORE, the Debtor and Trustee respectfully request that the Court extend the deadline for filing the Discovery Plan and Scheduling Order each for a period of thirty (30) days, and for such other and further relief as is appropriate.

Respectfully submitted,
Trustee Stacy B. Ferrara
by and through her attorney,

/s/ Peter J. Furness, Esq.
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